*Law Offices of*
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September 24, 2010

By ECF and Regular Mail

Ms. Una Dean
Assistant U.S. Attorney
271 Cadman Plaza East
Brooklyn, NY 11201

Re:     United States v. Sandra Manuela Rodriguez; CR-:10-463

Dear Ms. Dean,

I am writing to request clarification on a few points contained in the indictment against Ms. Rodriguez and the discovery provided to date.

1)  With respect to Count One, which alleges that Ms. Rodriguez imported 49 emeralds "contrary to law," please provide:
- the citation for the law Ms. Rodriguez's conduct was "contrary to"
- a statement of the essential facts constituting how Ms. Rodriguez's conduct was "contrary to law."

2)  With respect to Count Two, which alleges that Ms. Rodriguez made a false statement in a declaration, to wit: that the merchandise had a value of $50,000," please provide:
- the alleged false statement, whether the statement was oral or written, the date of the statement , the time of the statement, to whom the alleged statement was made, who else was present during the statement, and whether this alleged false statement is the same statement alleged in Count Three of the indictment.
- the meaning of the word "merchandise"

3)  With respect to the discovery of Ms. Rodriguez's statements in Bates numbered 0000000005 to 0000000017, please provide:
- the time of the statement, to whom the statement was made, whether the statement was oral or written, where the statement was made, and who else was present during the statement.

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This information is necessary for Ms. Rodriguez to be apprised of the charges against her, to adequately prepare for trial, to prevent surprise, to protect against double jeopardy, to avoid the necessity of a formal Request for a Bill of Particulars, and to prepare pretrial motions in a timely manner.

Please feel free to contact me with any questions or issues.

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Samuel Gregory Esq.
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cc: Clerk of the Court (ECF)